

October 5, 2005

Joe Karkoski, Senior Land and Water Use Analyst
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. Karkoski,

Thank you for the opportunity to review and comment on the draft Total Maximum Daily Load for San Joaquin River Diazinon and Chlorpyrifos TMDL report dated August 2005. We reviewed the proposed actions in the report and conclude they are consistent with applicable federal regulations concerning TMDL development. Our comments are as follows.

We support the language under surveillance and monitoring which addresses pesticide runoff from orchards and fields in the Valley as this is consistent with the adopted Sacramento River diazinon TMDL. We support that the joint toxicity of these chemicals be expressed as a measurement of additive toxicity in the calculation of the loading capacity. We support the calculation of toxic equivalents calculation according to the Board's Basin Plan's method for considering additive toxicity as this approach applies to both acute and chronic endpoints. In addition, this approach is easily applicable to additional chemicals besides the two pesticides currently being addressed in this action.

We appreciate your hard work and efforts on this TMDL and look forward to receiving the State's submittal following Regional Board, State Board, and OAL, action. Any questions or further discussions, please call me at 916-341-5520 or denton.debra@epa.gov.

Sincerely,

Debra L Denton, PhD
Environmental Scientist

cc: David Smith, USEPA Region 9